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*Counsel for certain Lender Trusts and their  
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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>CIRCUIT CITY STORES, INC., et al.,</b>	)	<b>Case No. 08-35653-KRH</b>
	)	
<b>Debtors.</b>	)	<b>Jointly Administered</b>

**NOTICE OF INTENT TO ATTEND HEARING  
Docket No. 14078**

Counsel for the Liquidating Trust has agreed with counsel for the below listed Lender Trusts (*see Exhibit A*) to continue the hearing noticed herein as Docket No. 14078 until the July setting. Counsel are hopeful that the administrative claim at issue (Claim No. 14363) will be resolved before the July hearing date. The parties have already reached agreement on many of the amounts at issue. If the hearing is necessary, however, the Lender Trusts intend to appear by and through their counsel, Robert J.E. Edwards. The Lender Trusts will oppose the reduction of the various Claim amounts requested by the Liquidating Trust. The Claim involves 19 different properties, all raising individual issues. Should a full evidentiary hearing be necessary, counsel for the Lender Trusts estimates that it will take approximately three hours to cover each of the 19

properties involved. The Lender Trusts will supplement this Notice with a summary of their positions prior to the July hearing, if necessary.

Dated: June 2, 2017

Respectfully submitted,

POLSINELLI LLP

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of June 2017, a true and correct copy of the above and foregoing was filed using the Court's CM/ECF system that sent notice of such filing to counsel for the Debtors, Liquidating Trust, U.S. Trustee, and all interested parties by ECF notification from the Court.

/s/ Robert J.E. Edwards

**Exhibit A**

**LENDER TRUSTS**

1. U.S. Bank National Association, as trustee for the registered holders of GMAC Commercial Mortgage Securities, Inc., Mortgage Pass-Through Certificates, Series 1997-C1.
2. U.S. Bank National Association, as trustee for the registered holders of GMAC Commercial Mortgage Securities, Inc., Mortgage Pass-Through Certificates, Series 1998-C2.
3. Wells Fargo Bank, N.A., successor by merger to Wells Fargo Bank Minnesota, N.A. f/k/a Norwest Bank Minnesota, N.A. as trustee for the registered holders of Merrill Lynch Mortgage Investors, Inc., Mortgage Pass-Through Certificates, Series 1998-C1-CLT.